

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

TEMPLE EMANUEL

Plaintiff,

v.

**CHURCH MUTUAL INSURANCE
COMPANY**

Defendant.

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CIVIL ACTION NO. 7:14-CV-513

**PLAINTIFF'S EXPERT DISCLOSURES AND
DESIGNATION OF EXPERT WITNESSES**

To: Church Mutual Insurance Company,
By and Through their Attorney of Record
Mark A. Sheiness
Sheiness, Glover & Grossman, LLP
4544 Post Oak Place, Suite 270
Houston, Texas 77027

Plaintiff, Temple Emanuel, makes these expert disclosures as required by Federal Rule of Civil Procedure 26(a)(2).

A. Identity of Experts

1. Plaintiff may use the following persons at trial to present evidence under Federal Rule of Evidence 702, 703, or 705:

- a. Plaintiff's retained testifying experts are: Paul Middleton, Guadalupe Garza, Mike Krismer, Peter de la Mora and John A. Millin IV. The experts' address and telephone number are as follows:

1. **Paul Middleton**
4615 Elmstone Court
Kingwood, Texas 77345
(800) 223-3818
2. **Guadalupe Garza**
Baldwin Roofing Company Inc.
642 Omaha Drive

P.O. Box 9380
Corpus Christi, Texas 78469-9380
Phone: (361) 888-8373
Fax: (361) 888-8087

3. **Mike Krismer, CIE**
Krismer Consulting, Inc.
Certified Indoor Environmental Consultant
Mold Assessment Consultant
7309 N 32nd Street
McAllen, Texas 78504
Phone: (956) 688-8341
4. **Peter De La Mora, PE**
PE Service Engineers, LP
11700 Southwest Freeway, Suite 211
Houston, Texas 77031
Phone: (713) 523-0104
5. **John A. Millin IV, Esq.**
Attorney for Defendant
Ortiz & Millin LP
1305 E Nolana Ave, Suite F
McAllen, Texas 78503
Phone: (956) 687-4567

B. Information from Retained or Specially Employed Experts

2. The following persons are those whom Plaintiff has retained or specially employed to provide expert testimony or whose duties as Plaintiff's employee regularly involve giving expert testimony:

1. **Paul Middleton**
4615 Elmstone Court
Kingwood, Texas 77345
(800) 223-3818

Mr. Middleton is a public adjuster. He is regularly employed as a testifying expert witness in Texas to address issues of causation in hail damage. Mr. Middleton is expected to testify regarding the cause of damage to Defendant's property, as well as the cost to repair such damage. Mr. Middleton's curriculum vitae is attached, and his report will be produced when it is generated.

2. **Gaudalupe Garza**
Baldwin Roofing Company Inc.

642 Omaha Drive
P.O. Box 9380
Corpus Christi, Texas 78469-9380
Phone: (361) 888-8373
Fax: (361) 888-8087

Mr. Garza is a roofing contractor. He is regularly employed as a testifying expert witness in Texas to address issues of causation in hail and windstorm damage. Mr. Garza is expected to testify whether Defendant's roof suffered damage from the hail and windstorm that occurred on March 29, 2012, as well as the cost to repair such damage. Mr. Garza's curriculum vitae is attached, and his report will be produced after it is generated.

3. **Mike Krismer, CIE**
Krismer Consulting, Inc.
Certified Indoor Environmental Consultant
Mold Assessment Consultant
7309 N 32nd Street
McAllen, Texas 78504
Phone: (956) 688-8341

Mr. Krismer is a certified indoor environmental consultant and mold assessment consultant. He has served as a testifying expert in trial, deposition, arbitration and/or mediation, in over 400 water damage related claims. Mr. Krismer is expected to testify regarding the damage caused to the interior of Defendant's property by the hail storm that occurred March 29, 2012. Mr. Krismer's curriculum vitae is attached, and his report will be produced after it is generated.

4. **Peter De La Mora, PE**
PE Service Engineers, LP
11700 Southwest Freeway, Suite 211
Houston, Texas 77031
Phone: (713) 523-0104

Mr. De La Mora is a registered professional engineer and general contractor. He has given courtroom and deposition testimony in domestic and international litigation. Mr. De La Mora is expected to testify regarding his assessment of the damages to Defendant's building caused by a hail and wind storm that occurred on March 29, 2012. His curriculum vitae is attached, and his report will be produced after it is generated.

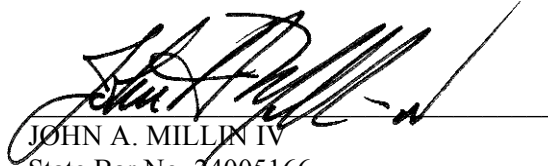
5. **John A. Millin IV, Esq.**
Attorney for Plaintiff
Millin & Millin LP
4900 N. 10th Street, Suite C4
McAllen, Texas 78504
Phone: (956) 631-5600

Mr. Millin is an attorney that will testify regarding his education, training and experience. In addition, Mr. Millin will testify as to all costs, reasonable and necessary attorney's fees incurred by or on behalf of Plaintiff in prosecuting this lawsuit. Mr. Millin's curriculum vitae is attached.

C. Information from Non-Retained or Specially Employed Experts

In addition, Plaintiff reserves the right to elicit expert testimony from any non-retained experts, such as those employed by Defendant, if any, or any potential fact witness qualified as an expert.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John A. Millin IV", is written over a horizontal line.

JOHN A. MILLIN IV
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Attorney for Plaintiff

OF COUNSEL:

Millin & Millin, PLLC

CERTIFICATE OF SERVICE

I certify that a copy of Plaintiff's Designation of Experts was served upon all known counsel of record via facsimile and/or certified mail, return receipt requested on October 31, 2014 as follows:

VIA FACSIMILE (713) 374-7049

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Attorneys in Charge for Defendant

A handwritten signature in black ink, appearing to read "Marc A. Sheiness", written over a horizontal line.